



FACILITY COMPLIANCE INSPECTION REPORT

Division of Waste Management Solid Waste Section

UNIT TYPE:

Lined MSWLF		LCID		YW		Transfer	<input checked="" type="checkbox"/>	Compost		SLAS		COUNTY: Forsyth PERMIT NO.: 34-24 FILE TYPE: COMPLIANCE
Closed MSWLF		HHW		White goods		Incineration		T&P	<input checked="" type="checkbox"/>	FIRM		
CDFL		Tire T&P / Collection		Tire Monofill		Industrial Landfill		DEMO		SDTF		

Date of Site Inspection: April 17, 2014 & May 7, 2014

Date of Last Inspection: May 31, 2012

FACILITY NAME AND ADDRESS:

Abbey Green, Inc. and Overdale Holdings, Inc.
Transfer, Recycle, Resource Recovery and Processing Facility
Post Office Box 12339
Winston-Salem, North Carolina 27117

GPS COORDINATES: **N:** 36.03203 **W:** 80.23395

FACILITY CONTACT NAME AND PHONE NUMBER:

Name: Randall Baker
Telephone: (336) 785-2130
Email address: RBaker@AbbeyGreen.com

FACILITY CONTACT ADDRESS:

Abbey Green, Inc.
Randall Baker, General Manager
Post Office Box 12339
Winston-Salem, North Carolina 27117

PARTICIPANTS:

Randall Baker, General Manager
Jim Bryant, Project Manager
Charles Gerstell, NCDENR-Solid Waste Section
Sarah M. Rice, NCDENR-Solid Waste Section
Larry Frost, NCDENR-Solid Waste Section

STATUS OF PERMIT:

A Permit to Operate 3424-TRANSFER-2010, Abbey Green Inc. was issued to Overdale Holdings, Inc. (Owner) and Abbey Green, Inc. (Operator) on September 3, 2013. The Permit to Operate shall expire July 30, 2015.

PURPOSE OF SITE VISIT:

Comprehensive Inspection

STATUS OF PAST NOTED VIOLATIONS:

N/A

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OBSERVED VIOLATIONS

None

The item(s) listed above were observed by Section staff and require action on behalf of the facility in order to come into or maintain compliance with the Statutes, Rules, and/or other regulatory requirements applicable to this facility. Be advised that pursuant to N.C.G.S. 130A-22, an administrative penalty of up to \$15,000 per day may be assessed for each violation of the Solid Waste Laws, Regulations, Conditions of a Permit, or Order under Article 9 of Chapter 130A of the N.C. General Statutes. Further, the facility and/or all responsible parties may be subject to enforcement actions including penalties, injunction from operation of a solid waste management facility or a solid waste collection service and any such further relief as may be necessary to achieve compliance with the North Carolina Solid Waste Management Act and Rules.

ADDITIONAL COMMENTS

1. This facility is a transfer, recycle, resource recovery and processing facility for construction and demolition debris.
2. An initial inspection was performed on April 17, 2014. A subsequent inspection was performed on May 7, 2014 with Larry Frost, Permitting Engineer, to evaluate the operations of the facility and their scope in relation to the Permit to Operate.
3. The permit and operations plan were reviewed. Both documents were readily available upon request and current.
4. The Permit to Operate issued on September 3, 2013 approved changes to the Operations Plan and service area as detailed under General Facility Permit Condition #13.
5. The facility is permitted to receive construction and demolition debris generated within Alexander, Alamance, Cabarrus, Catawba, Davidson, Davie, Forsyth, Guilford, Iredell, Mecklenburg, Randolph, Rockingham, Rowan, Stokes, Surry, Union, Yadkin and Wilkes Counties.
6. The facility is approved to dispose of residual C&D debris at the Old Salisbury Road Landfill (permit # 34-12),
7. Gold Hill Road Landfill (permit # 76-06), A-1 Sandrock Landfill (permit # 41-17),
8. Tonnage records were reviewed from January 2014 through May 2013. During this time period, the facility received approximately 105 tons of waste each operating day.
9. Certified Transfer Station Operations Specialists:
 - Randall Baker (expires 10/17/16)
 - Jim Bryan (expires 10/19/16)
 - Josh S. Cox (expires 9/13/16)
 - Thomas Matt Gills (expires 3/29/15)
 - David B. Teague (expires 10/20/14)
10. Mr. Bryan has also received AHERA Initial Building Inspection for Asbestos Certification which expires on December 12, 2014.
11. Facility personnel training records were available upon request and appeared adequate.
12. Waste screening reports were verified for November 2013 through April 16, 2014. The reports were performed with good frequency and contained good documentation concerning the waste loads that were screened. It appeared that greater than 1% of the incoming waste stream was being screened.
13. All incoming waste was being deposited solely on the tipping floor at the time of both inspections. There is approximately 12" of fall from the entrance of the tipping floor to the leachate drain to ensure that leachate does not bypass the drain.
14. During the April 14th inspection, a portion of the wind fence on the north side of the site had been knocked over. Inspection of the facility on May 7th found the wind fence had been repaired.

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15. During the April 14th inspection, a portion of the leachate drain had been allowed to fill up with residue from facility operations.
- Mr. Baker explained that a portion of the metal grates covering the drain were continuously being damaged from facility traffic in the primary unloading area. Mr. Baker explained that the intent was to leave the residue in the filled portion of the leachate drain to direct flow to the remainder of the drain that was free of residue and buildup.
 - It was recommended that all residues be removed from the leachate drain, all covers placed back over the drain to original design, and any desired changes in design be submitted to the Permitting Branch for approval prior to implementation.
 - Inspection of the Facility on May 7th found all residues had been removed from the leachate drain.
 - Covers made of plywood had been placed over the drain in the portion of the drain that was previously filled with residues. Mr. Baker explained that these covers would work as efficiently as the previous covers and would be cheaper to replace if damaged.
 - **Please ensure that any design changes to the leachate drain system are submitted to the Permitting Branch for approval to ensure proper function of the system.**
16. During the April 14th inspection, a load of waste was observed on the tipping floor which contained a significant amount of municipal solid waste such as books, magazines, and a bag of household trash. Mr. Baker explained that this load originated from an apartment renovation. It was expressed incoming loads should be clearly identifiable as construction and demolition waste. Loads containing heavy amounts of municipal solid waste should not be accepted at this facility. Mr. Baker had the load removed from the tipping floor and placed in a container to be taken to a municipal solid waste management facility. Mr. Baker also explained that loads from such operations would not be accepted in the future.
- No unacceptable waste streams were observed on the tipping floor during the May 7th inspection.
17. During the May 7th inspection, residual mixed construction and demolition waste was observed depositing onto the ground at the end of the picking line. The waste pile extended beyond the portion of the picking line covered by a metal roof. The approved Operations Manual states in part: *“Non-recyclable materials to be transported to a landfill or other disposal facilities will be securely placed in containers or trucks, placed under a weather proof cover or tarped if exposed to the weather, and removed within 5 days.”*
- Current facility operations do not appear to comply with the approved Operations Manual as residual mixed C&D waste is not being placed in containers or kept under cover prior to being placed into a truck for disposal at a permitted solid waste management facility. This is a greater concern during periods of rain as leachate can be generated and must be collected.
 - **A supplemental letter under separate cover from the Permitting Branch will be forthcoming with recommendations to address this concern.**
18. The property located southeast of the tipping floor (PIN#: 6833-52-3269) is used for stockpiling and screening of soil left over from the processing of construction and demolition waste.
- A sample is taken once per week from a container of material (primary fines) that is taken to the stockpile area. Quarterly, samples from the containers are combined and then tested for asbestos and heavy metals. The stockpiled soil is then screened to create a soil amendment (secondary fines).
 - Unscreened material contained a large amount of construction and demolition residuals such as wood, paper, and plastics.
 - During the May 7th inspection, paper and plastic had been deposited into the drainage ditch located on the south side of the access road into this area. All waste needs to be removed from the ditchline and steps taken to ensure no waste deposits into the ditchline in the future.
 - This area was observed with Larry Frost, Permitting Engineer during the May 7th inspection to determine what actions needed to be carried out to ensure activities in this area complied with the permit, General Statutes, and Administrative Rules.
 - **A supplemental letter under separate cover from the Permitting Branch will be forthcoming with recommendations to address this concern.**

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19. The white goods storage area was observed during both inspections. White goods are placed in a 30-yard roll-off container located south of the tipping floor
- During the April 14th inspection, two refrigerators and two freezers were observed lying on their sides. Please ensure that all Freon containing appliances are stored in an upright position to ensure that Freon is not lost prior to removal from the appliance.
 - Inspection of the facility on May 7th found no white goods on site. It is recommended that the facility take steps to ensure that the integrity of Freon containing appliances are maintained prior to removal of that material such as leveling the earthen pad occupied by the 30-yard roll-off container.
20. Observed the processing area for used concrete, brick and asphalt located south of the tipping floor.
- A large amount of unground brick and concrete was on site at the time of both inspections. However, a significant amount of material had been ground prior to the second inspection performed on May 7th.
 - The facility uses mobile waste bags to remove material unacceptable for concrete products such as paper and plastics. Please ensure that all material removed from the processed material is properly disposed at the end of each operating day.
 - A 30-yard roll-off container is provided for the collection of metal removed during the grinding process.
21. Observed the Notified Land Clearing and Inert Debris (LCID) Landfill.
- The working face was quite small at the time of both inspections. Less than one acre of land clearing debris was exposed.
 - A significant amount of inert debris was being disposed of within the landfill.
 - During the April 14th inspection, Mr. Baker and Mr. Bryant were advised that efforts needed to be made to clearly delineate the limits of the landfill.
 - Inspection of the facility on May 7th found that stakes with orange flags had been placed along the toe of the slope of the landfill. Mr. Bryant explained that these stakes marked the 100-foot setback from the property boundaries to the west and south. Please continue efforts to clearly delineate the waste boundaries of the landfill. Measures are still needed to mark the eastern boundary of the landfill.
 - During both inspections, multiple plastic buckets and some metal was observed at the toe of the landfill slope. These materials are unacceptable for disposal in a LCID landfill and must be removed.
 - Continue to ensure that no painted materials are disposed of within the LCID Landfill.
22. Observed stockpiled material on the property located north of the primary facility (PIN#: 6833-53-3585).
- A portion of this parcel is used for stockpiling and grinding of untreated/unpainted wood. Once ground, the material is sent out for boiler fuel.
 - The inspection performed on April 14th found construction materials such as plastic buckets, foam insulation, and cardboard.
 - Inspection of the facility on May 7th found all construction and demolition material had been removed from the stockpile.
 - A significant amount of the untreated/unpainted wood had been ground between inspections.
 - Mr. Baker and Mr. Bryant were advised during the April 14th inspection to ensure that storage and grinding activities did not result in material falling over the slope along the south side of the property.
 - Inspection on May 7th found that facility staff had begun pulling material away from the southern slope. A berm was being built along the top of the slope to keep material from falling over the slope.
 - A large stockpile of unground, engineered wood (OSB and plywood) was located on the east side of the parcel at the time of inspection. Once ground, the material is used on site or sent out for boiler fuel. Mr. Baker explained that the stockpile was larger than desired as their grinding contractor had been delayed. Continue efforts to ensure that stockpiled material is stored to ensure that no material is lost over the fill slope in this area.

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- A portion of the parcel is also used for stockpiling of processed gypsum from crushing of drywall. Final product is marketed for agricultural uses.
 - Initially, drywall is kept in a bunker at the primary sorting area and then crushed by heavy equipment on the tipping floor.
 - Please ensure that storage on site does not exceed 400 tons of separated drywall and 400 tons of processed drywall as detailed in the approved Operations Manual.
 - A portion of the property is also used for storage of empty roll-off containers for various customers.
23. The facility is approved for deconstruction of mobile homes. No mobile homes were on site at the time of inspection.
24. During the May 7th inspection, severe windblown waste was observed surrounding the tipping floor and picking line. **General Facility Condition # 19(ii) requires states:** *"All windblown materials must be collected by the end of the day and no windblown material may be allowed to leave the facility boundary."* Although windblown waste was severe at the time of inspection, no material was observed outside of the facility boundary. Mr. Baker was advised to collect windblown waste throughout the facility and have it properly disposed.
- Inspection of the facility on May 7th found a significant improvement of windblown waste.
25. Asphalt shingles are collected in a concrete bin adjacent to the entrance to the facility.
26. All residual construction and demolition waste is loaded into a transfer trailer and taken to a permitted solid waste facility. Please ensure that all waste within and surrounding the trailer loading area is picked up and properly disposed at the end of each operating day.
27. The facility had proper signage.
28. A gate was located at the entrance of the facility to prevent unauthorized entry.

Please contact me if you have any questions or concerns regarding this inspection report.



Charles T. Gerstell
Environmental Senior Specialist
Regional Representative

Phone: (704) 235-2144

Sent on: <u>6/4/14</u>	<input checked="" type="checkbox"/>	Email		Hand delivery		US Mail		Certified No. <u> </u>
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Copies: Jason Watkins, Western District Supervisor
Sarah M. Rice, Compliance Officer
Larry Frost, Permitting Engineer